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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ORIGINAL

Rohm and Haas Chemicals LLC	)	
Application for Certificate of	)	Docket No. 06-0775
Service Authority under Section	)	
16-115 of the Public Utilities Act	)	

CHIEF CLERK'S OFFICE  
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COMMERCE COMMISSION

**RESPONSE TO ADMINISTRATIVE LAW JUDGE'S RULING OF JANUARY 4, 2007  
AND MOTION FOR CONFIDENTIAL TREATMENT**

Pursuant to the Notice of Ruling issued by the Administrative Law Judge on January 4, 2007 ("January Ruling"), Rohm and Haas Chemicals LLC ("Rohm and Haas") provides the following information and clarification as requested. This response contains confidential and proprietary business and financial information regarding Rohm and Haas Company, the disclosure of which may cause business harm to Rohm and Haas Company. Pursuant to Section 451.60 of the Illinois Administrative Code, Rohm and Haas respectfully requests that the Illinois Commerce Commission ("Commission") treat Attachment 2 and 4 of this response as "Confidential," that they not be part of the public record, and not be posted on the website of the Illinois Commerce Commission of the Office of the Clerk.

**1. Section 451.110(a)(2)**

Attached (as Attachment 1) is a recent report from Moody's Investors Service, dated October 16, 2006, that reflects Rohm and Haas Company's current credit rating, which satisfies the Section 451.110(a)(2) requirements that an applicant's affiliate must have a commercial paper rating of P-2 or higher from Moody's Investors Service; or at least a long-term credit rating of Baa3 or higher. Additionally, in response to the January Ruling, Rohm and Haas

verifies that the borrowing agreement, titled Intercompany Master Loan Agreement (“Loan Agreement”), provided in Attachment F of its application, satisfies the requirements of Section 451.110(a)(2)(B), because the amount available to Rohm and Haas is not limited pursuant to the terms of the effective Loan Agreement.<sup>1</sup> Specifically Section 1.1 of the Loan Agreement, Amount of Credit, provides that Rohm and Haas Company shall provide credit to each of its direct and indirect subsidiaries “from time to time.” Therefore, the amount of credit available to Rohm and Haas is no less than the greater of \$500,000 or 5% of the amount of Rohm and Haas Company’s revenue for its most recent fiscal year and satisfies Section 451.110(a)(2)(B).

**2. Section 451.110(b)**

Attached (as Attachment 2 - **Confidential**) is the proof of insurance that demonstrates Rohm and Haas has sufficient commercial general liability insurance coverage in the amount of at least \$100,000,000 with an insurance company assigned a Best’s rating of A- or better and Best’s financial sizes of VII or larger. This attachment contains confidential and proprietary business and financial information of Rohm and Haas Company regarding its corporate operations, the disclosure of which may result in serious harm of Rohm and Haas Company’s business operations. Rohm Haas respectfully requests confidential treatment of this attachment as Section 451.60 of the Illinois Administrative Code allows for the protection of such information.

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<sup>1</sup> Additionally, in a separate motion filed concurrently with this response, Rohm and Haas requests confidential treatment of the Loan Agreement provided in Attachment F of its December 4, and as amended on December 21, Application for Certificate of Service Authority under Section 16-115 of the Public Utilities Act.

**3. Section 451.30(a)**

Attached (as Attachment 3) is the proof of publication mailed for filing on January 4, 2007 and accepted for filing by the Commission on January 5, 2007.

**4. Section 451.130(b)**

Attached (as Attachment 4 - **Confidential**) is a corporate organizational chart that indicates the position of the persons or agents used to meet managerial qualifications. This attachment contains confidential and proprietary business information of Rohm and Haas Company regarding its corporate operations and business structure, the disclosure of which may result in business and operational harm. Rohm Haas respectfully requests confidential treatment of this attachment as provided under Section 451.60.

Respectfully submitted,

**Rohm and Haas Chemicals, LLC**

By: 

Vanessa G. Tanaka  
Counsel for  
Rohm and Haas Chemicals LLC

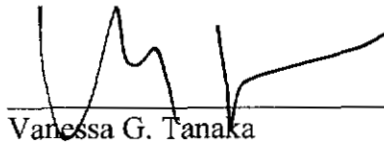
Dated: January 11, 2007

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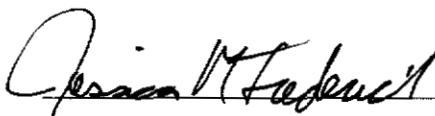
# VERIFICATION

STATE OF ILLINOIS	)	
	)	ss:
COUNTY OF _____	)	

Vanessa G. Tanaka, being first duly sworn, deposes and says that she is an attorney for Rohm and Haas Chemicals LLC; that she has read the foregoing Response to Administrative Law Judge's Ruling of January 4, 2007 and Motion for Confidential Treatment of Rohm and Haas Chemicals LLC, and all of the attachments accompanying and referred to within the Response to Administrative Law Judge's Ruling of January 4, 2007 and Motion for Confidential Treatment; and that the statements contained in the Response to Administrative Law Judge's Ruling of January 4, 2007 and the attachments are true, correct and complete to the best of her knowledge, information and belief.

  
Vanessa G. Tanaka

Subscribed and sworn to before me  
this 11 day of January, 2007.

  
\_\_\_\_\_  
Notary Public

